

ORIGINAL

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FILED

DISTRICT COURT OF GUAM

MAY 31 2006

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
KUANG-HUA CHEN,)
)
Defendant.)

CRIMINAL CASE NO. 04-00008

**UNITED STATES' MOTION
TO RELEASE GRAND JURY
TRANSCRIPTS**

COMES NOW the United States and moves this Honorable Court for an order allowing the release to defense counsel, Curtis C. Van de veld, of the testimony of the witnesses who appeared before the Grand Jury in this matter and who will testify at trial. Presently, these transcripts are sealed pursuant to Federal Rules of Criminal Procedure 6(e); counsel is entitled to receive them after the witnesses' testimony pursuant to 18 U.S.C. § 3500.

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1 This motion is made for the reason that release of this document prior to the testimony of
2 the witnesses will expedite the timely conduct of the trial itself.

3 Respectfully submitted this 3rd day of May, 2006.

4 LEONARDO M. RAPADAS
5 United States Attorney
6 Districts of Guam and NMI

7 By:



8 MARIVIC P. DAVID
9 Assistant U.S. Attorney
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